

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. 2:15-md-02641-DGC

**THIS DOCUMENT RELATES TO THE FOLLOWING
CASES:**

Patsy Curry v. C.R. Bard Inc., et al.
No. 2:16-cv-03830-DGC

Michele L. Dorsey v. C.R. Bard Inc., et al.
No. 2:17-cv-01366-DGC

Daniel J. Hearns Jr. v. C.R. Bard Inc., et al.
No. 2:16-cv-01276-DGC

Randell S. Heling v. C.R. Bard Inc., et al.
No. 2:17-cv-01316-DGC

Emma Howe v. C.R. Bard Inc., et al.
No. 2:17-cv-012153-DGC

Debra Jean and Richard Jean v. C.R. Bard Inc., et al.
No. 2:17-cv-01334-DGC

Gloria J. Johnson v. C.R. Bard Inc., et al.
No. 2:17-cv-01365-DGC

Jessica MaGee v. C.R. Bard Inc., et al.
No. 2:17-cv-01313-DGC

Karen Miller v. C.R. Bard Inc., et al.
No. 2:16-cv-01096-DGC

Thomas E. Moore and Gayle Moore v. C.R. Bard Inc., et al.
No. 2:16-cv-03898-DGC

Jessica L.Norman v. C.R. Bard Inc., et al.
No. 2:15-md-02641-DGC

Joseph Pasierb Jr. v. C.R Bard Inc., et al.
No. 2:16-cv-00857-DGC

Glenda Patrick v. C.R. Bard Inc., et al.
No. 2:17-cv-00912-DGC

Clara Powell and Jeffrey Powell v. C.R. Bard Inc., et al.
No. 2:16-cv-01275-DGC

Lynwood Wilson and Joyce Wilson v. C.R. Bard Inc., et al.
No. 2:17-cv-01332-DGC

MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL

COME NOW the Plaintiffs in the above referenced actions and move that Michael S. Kruse and the firm of NIEMEYER, GREBEL & KRUSE, LLC, be substituted as their counsel of record; and, in conjunction therewith, that J. Mark Kell, Mark C. Aubuchon, and the firm of KELL LAMPIN LLC be withdrawn as counsel of record in these actions. The above referenced Plaintiffs as well as the attorneys of NIEMEYER, GREBEL & KRUSE, LLC and KELL LAMPIN LLC consent to the proposed substitution and withdraw.

**NIEMEYER, GREBEL & KRUSE,
LLC**

/s/ Michael S. Kruse
Michael S. Kruse
10 S. Broadway
Suite 1125
St. Louis, MO 63102
314/241-1919 (T)
314/665-3017 (F)
kruse@ngklawfirm.com
Attorneys for Plaintiffs

KELL LAMPIN, LLC

/s/ Mark C. Aubuchon
J. Mark Kell
Mark C. Aubuchon
14500 South Outer Forty, Suite 407
Chesterfield, MO 63107
636/757-1700 (T)
636/489-3971 (F)
mkell@kelllawfirm.com
maubuchon@kelllawfirm.com
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed and served on all counsel of record by way of the Court's CM/ECF filing system this 6th day of September, 2017.

/s/ Michael S. Kruse